

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A TO PLAINTIFFS' NOTICE
OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE
REGARDING DENISE ELSE, M.D., FOR NON-REVISION PTO 298 (ELECTION
WAVE)**

Plaintiffs filed a Notice of Adoption [Dkt. 7277] in the Election Wave cases identified in Exhibit A to their Notice adopting their Motion to Exclude Certain Opinions and Testimony of Denise Elser, M.D. and Supporting Memorandum from Ethicon Wave 1. Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Denise Elser, M.D. for Ethicon Wave 1, Dkt. 2149; Wave 2, Dkt. 2513; and, Wave 3, Dkt. 2932. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1, 2, and 3 response briefing.

Respectfully submitted,

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and Johnson & Johnson

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage

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